

CONSUMER ACTION NETWORK

Of, By and For Deaf and Hard of Hearing Americans

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October 25, 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

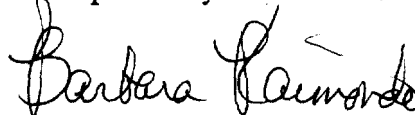
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Dear Mr. Caton:

The Consumer Action Network (CAN) submits these comments (an original and nine copies) to the Federal Communications Commission on its Notice of Inquiry on Access to Telecommunications Services, Telecommunications Equipment, and Customer Premises Equipment by Persons with Disabilities. CAN, a coalition of 19 national organizations of, by, and for deaf and hard of hearing people, addresses advocacy and legislative issues important to our constituency. Such issues include protecting the rights of deaf and hard of hearing persons, improving quality of life, empowering consumer leadership and self-representation, and ensuring equal access to education, employment, communication, technology, and community life.

Our comments urge the Commission to implement Section 255 in a manner that will ensure maximum accessibility and usability of telecommunications services and equipment for persons with disabilities. CAN thanks the Federal Communications Commission for its commitment to technology access for all Americans.

Respectfully submitted,



Barbara Raimondo, J.D.
Legislative Consultant

Enclosures

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REGULAR MEMBERS: American Association of the Deaf-Blind • American Athletic Association of the Deaf • American Society for Deaf Children • Association of Late Deafened Adults • Deaf Women United, Inc. • Gallaudet University Alumni Association • National Association of the Deaf • National Black Deaf Advocates • National Congress of Jewish Deaf • National Fraternal Society of the Deaf • National Hispanic Council of Deaf and Hard of Hearing People • Telecommunications for the Deaf, Inc. AFFILIATE MEMBERS: Association of College Educators: Deaf and Hard of Hearing • American Deafness and Rehabilitation Association • Convention of American Instructors of the Deaf • The Caption Center • Conference of Educational Administrators Serving the Deaf, Inc. • National Captioning Institute • Registry of Interpreters for the Deaf, Inc.

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OCT 25 1996

**Before the
Federal Communications Commission
Washington, D.C.**

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)
Implementation of Section 255 of the)
Telecommunications Act of 1996)
Access to Telecommunications Services,)
Telecommunications Equipment, and)
Customer Premises Equipment)
By Persons with Disabilities)

WTDocket No. 96-198

**Comments of the
Consumer Action Network**

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October 25, 1996

**Before the
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Customer Premises Equipment)	
By Persons with Disabilities)	

**Comments of the
Consumer Action Network**

Introduction

The Consumer Action Network (CAN) submits these comments to the Federal Communications Commission on its Notice of Inquiry on Access to Telecommunications Services, Telecommunications Equipment, and Customer Premises Equipment by Persons with Disabilities (released September 19, 1996). CAN, a coalition of 19 national organizations¹ of, by, and for deaf and hard of hearing people, addresses advocacy and legislative issues important to our constituency. Such issues include protecting the rights of deaf and hard of hearing persons, improving quality of life, empowering consumer leadership and self-representation, and ensuring equal access to education, employment, communication, technology, and community life.

Access to telecommunications equipment and services is among the most important issues facing deaf and hard of hearing Americans this century. Telecommunications equipment and services are heavily used in schools, universities, the workplace, and the home. As technology advances, its use will continue to increase. Access to technology, or lack of it, will strongly affect an individual's quality of life. Our nation cannot afford to

¹Please see signature page for a list of CAN members.

leave anyone behind in the quest for more sophisticated technology.

Today's task is to gather information to devise rules that will be applicable to today's technology and to technology that has not even been thought of yet. The rules must be applicable in environments that are carried by lines that are neither cable nor telephone, but a combination of both, as well as through the airwaves. It is essential that the mandates of Section 255² of The Telecommunications Act of 1996³ be implemented in a manner that will ensure maximum accessibility for persons with disabilities.

CAN thanks the Federal Communications Commission for its commitment to access for all Americans and for the opportunity to comment on this important issue. We support the comments of the National Association of the Deaf, one of our member organizations, and the Consortium for Citizens with Disabilities, of which we are a member.

III. Statutory Requirements

2. Definition of "Telecommunications Equipment" and CPE

9. . . . We seek comment regarding the treatment of equipment that can be used with telecommunications services and which also can be used with other services that do not fall within the statutory definition of telecommunications services.

Equipment that can be used with telecommunications services and which also can be used with other services that do not fall within the statutory definition of telecommunications services should be treated the same way as equipment that can only be used with telecommunications services. The equipment manufacturer has no way of knowing in advance which specific pieces of equipment will be used with one and which will be

²Section 255 (b) provides that "A manufacturer of telecommunications equipment or customer premises equipment shall ensure that the equipment is designed, developed, and fabricated to be accessible to and usable by individuals with disabilities, if readily achievable." Section 255 (c) requires that "A provider of telecommunications services shall ensure that the service is accessible to and usable by individuals with disabilities, if readily achievable.

³47 U.S.C. §255.

used with the other. If a manufacturer produced two products that were exactly the same except that one was accessible under Section 255 and one was not, this would be confusing to the consumer. There is no logical reason to make this distinction. Further, making this distinction could put manufacturers in an uncertain position regarding their compliance with Section 255. If a consumer purchases equipment for the purposes of connecting to non-telecommunications services and uses it for that purpose, the manufacturer would not be in violation of Section 255. If later the consumer decided to use that equipment for telecommunications services, the manufacturer could be found in violation. Compliance with the law would depend on the individual consumer's choice of how to use the product. The better rule would be to require that all equipment that can be used with telecommunications services be accessible.

The intent of the law is to ensure accessibility to and usability of telecommunications equipment and services. The Commission should make rules that result in maximum and reliable accessibility and usability.

3. Manufacturers Subject to Section 255

11. . . . We note that all equipment marketed or sold in the United States must meet all applicable technical and operational requirements, but we question whether the same approach should be adopted for accessibility standards, especially in light of different accommodations that may be necessary for specific disabilities. We also ask commenters to consider the effect of differing national equipment accessibility standards on how manufacturers' ability to design, develop, and fabricate accessible equipment should be weighed when evaluating complaints. When considering what accessibility measures are readily achievable, should the Commission give weight to the different standards confronted by a manufacturer with markets in other nations?

Equipment manufacturers should be required to meet accessibility requirements in the same way that they meet applicable technical and operational requirements. Accessibility standards are no less important than

technical and operational requirements. Telecommunications equipment is not usable if it does not meet applicable technical and operational standards. Similarly, telecommunications equipment is not usable by consumers with disabilities if it does not meet applicable accessibility requirements.

A large percentage of telecommunications equipment is produced abroad and for markets in a variety of countries. The different standards confronted by a manufacturer with markets in other nations are of little weight here. Accessibility requirements under Section 255 would be useless if manufacturers were not subject to them merely because equipment was produced abroad or produced for other markets. In light of the fact that so many manufacturers do produce for many markets, making an exception for this purpose would give manufacturers an instant "easy out" for them not to make their products accessible and usable by persons with disabilities.

The United States, already a world leader in technology, should be the world leader in technology that is accessible to and usable by persons with disabilities. Companies that market their telecommunications equipment and services here in the United States can also make these accessible and usable products available to disabled and non-disabled persons abroad.

Manufacturers producing for markets abroad have been able to adapt to the applicable technical and operational requirements of those countries as well as those of United States. Once accessibility guidelines are made clear and universal design is incorporated into the manufacturing process, manufacturers will know how to make their products so that they are accessible to and usable by people with disabilities in the United States and elsewhere. There is no need to weaken the requirements merely because the equipment will be marketed in countries other than the United States.

12. . . . If several companies are involved in the design and manufacture of a single piece of equipment, how should responsibility be apportioned? To the

extent that some manufacturers design, develop, and fabricate equipment but then license their equipment design to other manufacturers for production, how should Section 255 apply to the secondary manufacturers or resellers?

Each company should remain responsible for accessibility even when several companies are involved in the design and manufacture of a single piece of equipment. Each company must be held liable. The companies may choose to allocate responsibility among themselves by contract. This is a mechanism used by some places of public accommodation to comply with the Americans with Disabilities Act (ADA).⁴ If a conference is held in a hotel, under the ADA both conference sponsor and the hotel are required to ensure accessibility for individuals with disabilities. Often the sponsor and hotel agree through contract which party will take this responsibility. This has proven to be an effective way whereby the party in the better position to provide accessibility takes the responsibility for it as between the two parties.

Secondary manufacturers or resellers must be accountable to comply with the law the same way primary manufacturers are. In the process of obtaining the license, they should ensure that the product design provides accessibility and usability.

B. Requirements

16. We seek comment on the factors we should consider in attempting to apply the components of the ADA definition of "readily achievable" to telecommunications equipment and services . . . We seek comment regarding how to apply the "readily achievable" standard in a way that will take advantage of market and technological developments, without constraining competitive innovation. For example, when a service provider or manufacturer of equipment or CPE establishes its accessibility with respect to a specific disability, should that demonstration relieve it of the obligation to adopt subsequent, improved accessibility measures for some period or should the service provider's accessibility obligation be continually adjusted to recognize the most recently developed technology that is "readily achievable?"

⁴42 U.S.C. §12101 *et seq.*

CAN believes that the answer to this is found in the statute. The Telecommunications Act clearly delineates the factors that should be considered in ascertaining whether accessibility is "readily achievable." This question is leading away from the focus of the law, which is to provide accessibility and usability to individuals with disabilities. The category "individuals with disabilities" does not include only some people with disabilities. In light of these requirements, manufacturers should design equipment that will be usable by all people with disabilities. Allowing the industry to be relieved of its responsibility to create accessibility and usability for all when it has only created it for some is giving it permission to decline to comply with the law. Companies must concentrate on universal design. Once manufacturers create innovative ways to make their products accessible, those techniques can be used in the production of other technologies.

Let's look at a common example. The telephone is indispensable for everyday communication, and the use of voice prompted telephone services or voice mail is widespread. Currently, voice prompted telephone services cannot be used by deaf and hard of hearing individuals. These consumers cannot hear the prompt in order to touch the appropriate key on the telephone for a response, yet the phone services moves too quickly in order it to be used through a relay service. Further, these systems are generally not designed to be used with tts. Therefore, these services are not universally accessible. Yet they are accessible to users with a variety of other disabilities. Using the suggestion that providers could be relieved of responsibility towards people with some types of disabilities, providers would have no incentive to ever make this service accessible to deaf and hard of hearing people.

Further, under this scenario, manufacturers would be free to decide

which accessibility features to incorporate into their equipment. It is conceivable that the accessibility needs of a particular group of disabled individuals consistently would be ignored even as the needs of another group were regularly addressed.

Without the requirement that telecommunications services be accessible to all people with disabilities, there is always a risk that technology will not be usable for all people with disabilities.

The standard of "readily achievable," and that standard alone, should be applied. As further explained in our response to Question 18, if the "readily achievable" test is applied evenly it will not have a large affect on competitive incentives. Smaller firms with less capital will have less asked of them than larger firms with more capital.

The obligation to provide accessibility and usability with regard to a particular product should be ongoing. However, this may become a moot point given the vast number of telecommunications equipment and services brought to market every year, and given the short shelf life of these equipment and services. It may be that, given the time and cost involved in retrofitting existing equipment or services and the market demand for new and improved technology, the industry would not be called upon very often to retrofit equipment or services. The obligation to retrofit should not be removed, but as a practical matter, it may not be one that comes into play very often.

b. Costs; Financial Resources

17. . . . We ask commenters to supply pertinent information regarding:

- **The types and levels of costs that have been incurred to achieve or improve accessibility of existing offerings, and the extent to which they may serve as a basis for anticipating costs associated with accessibility standards to be developed.**

- **Cost savings when accessibility is achieved at the design stage . . .**

Deaf and hard of hearing people, until recently, typically have been unable to use the telephone or the broadcast or cable television set without additional equipment. In order to use the telephone, a tty had to be purchased,⁵ at a cost of approximately \$250 for a basic model to over \$800 for a model with large visual display for visually impaired deaf or hard of hearing callers. Currently a telephone that carries both voice and tty calls costs approximately \$250. In order to use the television, persons who are deaf or hard of hearing had to purchase a captioning decoder, at a cost of approximately \$150. Now, television sets larger than 13 inches carry a decoder chip costing around \$5.00, with a savings of around \$145 per television set.

In some cases current technology is not accessible to deaf and hard of hearing persons at any price. Cellular phone networks are one example of this. They are simply not designed to work with ttys. This very important means of communicating every day information, and more importantly, emergency information, is simply not available to deaf and hard of hearing callers at all.

18. . . . How can or should the financial resources of firms of widely varying characteristics be considered in a way that does not distort competitive incentives, but at the same time ensures accessibility?

The answer to this question can be found by going back to the analysis of "readily achievable." That phrase means:

[E]asily accomplishable and able to be carried out without much difficulty or expense. In determining whether an action is readily achievable, factors to be considered include--
(A) the nature and cost of the action needed under [the ADA];
(B) the overall financial resources of the facility or facilities involved in the action; the number of persons employed at such

⁵In states where a technology assistance program exists, much or all of this cost may be paid out of a state administered fund.

facility; the effect on expenses and resources, or the impact otherwise of such action upon the operation of the facility;
(C) the overall financial resources of the covered entity; the overall size of the business of a covered entity with respect to the number of its employees; the number, type, and location of its facilities; and
(D) the type of operation or operations of the covered entity, including the composition, structure, and functions of the workforce of such entity; the geographic separateness, administrative or fiscal relationship of the facility or facilities in question to the covered entity.⁶

This is a case by case analysis, not an industry-wide analysis. While financial resources are one characteristic to look at, other factors include the nature and cost of the action needed, its administrative and fiscal relationships, and the other factors mentioned above. When applying the test of whether accessibility and usability of a particular telecommunication service or piece of equipment is "readily achievable," one does not look at the characteristics of other firms. If this test is applied evenly it will not have any affect on competitive incentives. Further, it may be that the more accessible product is the more marketable one. With 45 million Americans having some kind of disability, and with the aging of the "baby boomers," with accompanying vision and hearing deterioration, the demand for accessible products may increase, particularly as the price of technology continues to drop. Rules on universal service supports may increase use and ownership of telecommunications services and equipment among these groups.

Additionally, non-disabled consumers may prefer the accessibility functions of new products. Curb cuts and ramps were originally designed for wheelchair users, but are more often used by walkers, bike riders, and parents pushing strollers. Captioned programming was originally intended for deaf and hard of hearing people, but as mentioned in our response to Question 33,

⁶ADA, 42 U.S.C. §12181 (9).

it is used and valued by other groups as well.

A company with large financial resources earned its income mainly through selling many of its items. If hearing consumers are buying a particular home computer in great numbers, chances are that deaf and hard of hearing people want that computer as well.

The "readily achievable" analysis is one that probably will not be undertaken often, given that manufacturers will be basing their equipment designs on the concept of universal design.

3. Definition of "Accessible To" and "Usable By"

22. We seek comment on whether a manufacturer or service provider must ensure that each of its telecommunications equipment, CPE, or service offerings is accessible to persons with various types of disabilities. . . .How should such alternative or modular-design approaches be regarded under the "readily achievable" standard if, for example, design changes to accommodate one disability make accommodation of other disabilities by the same offering more difficult, or if changes to accommodate multiple disabilities would make the offering technically or economically impracticable? . . .

CAN believes that as more equipment and service providers incorporate universal design into the early stages of development, the need for separate designs to accommodate different types of disabilities will decrease. Universal design standards should help ensure that designs that provide accessibility for individuals with one type of disability do not impede accessibility for individuals with another type. But to answer this question whether a manufacturer or service provider must ensure that each of its telecommunications equipment, CPE, or service offerings is accessible to persons with various types of disabilities, we should look to the statute. If it is "readily achievable" to make a particular product or service accessible to and usable by people with disabilities, it must be done. The analysis of "readily achievable" takes into account the nature and cost of the action needed.

However, it does not stop there. It must also consider the other factors outlined in the law, including the overall financial resources of the facility or facilities involved in the action and the effect on expenses and resources upon the operation of the facility. In other words, the analysis does not focus solely on the economics of one offering, but on many other factors as well.

CAN recognizes that perhaps not every product will be accessible and usable by all persons with disabilities. If accessibility and usability is not "readily achievable," the manufacturer or provider must ensure that the equipment or service is compatible with existing peripheral devices or specialized customer premises equipment, if "readily achievable." In writing the law this way, Congress envisioned that there would arise the circumstance this question poses. That is why there is the "fallback position" of compatibility. However, we must stress again the importance of universal design from the early stages.

23. We request commenters to provide an assessment of the extent to which accessible telecommunications services, telecommunications equipment, and CPE are currently available. Specifically, we request commenters to address the kinds of services and equipment that are currently on the market, and in the design and development stages and the trial or testing phase as well.

People who are deaf or hard of hearing have benefited a great deal from recent innovations in technology, including fax machines, electronic mail, and the Internet. However, the gains for this group lag behind the gains made by hearing consumers. Many types of services and equipment are not accessible to deaf and hard of hearing people. Some examples are:

- Computers services including the Internet and World Wide Web sites that do not have visual information to represent auditory information. For example, one can download a movie from the Internet, but captions will not be displayed. Many computers with television reception capability do not display captions.
- Services provided through voice prompted telephone systems. For

example, some national newspapers have a service through which a touch tone caller can select faxes on various topics covered by that paper. A major investment firm has an automated telephone service that gives investors access to their investments. When callers make trades using this system, they save 10% of the brokerage commission. Countless large organizations often have this type of automated system used by callers seeking information. Callers who are deaf or hard of hearing are unable to use them because they cannot hear the voice prompt, and these systems are not set up for use with ttys. Also, a caller cannot use a relay system with these types of calls because of the speed with which one must answer the prompt. So this whole category of phone systems is not accessible to or usable by deaf and hard of hearing individuals.

- Cellular phone networks. These networks simply are not designed to be used with ttys.
- Computers which are not compatible with ttys using the Baudot system.
- Some combination tty/voice pay phones which allow hearing callers to access their choice of calling card while not permitting the same choice for tty users.
- Pagers. Alpha-pagers do not have a direct tty answering service for callers to leave a typed message to other deaf individuals who have pager service. The relay service must be used to reach the pager service to ask the service to leave a message. Many pager users who are deaf or hard of hearing do not get messages that are left for them, only a number to call, despite requests to obtain the worded message.

25. We ask commenters to address the issue of defining "existing peripheral devices" and "specialized CPE," including specific examples of devices and equipment that could be considered to fall within the scope of the definition .

Existing peripheral devices include: monitors, keyboards, printers, central processing units, peripheral hard drives, modems, the mouse, and other computer hardware. Specialized CPE commonly used by deaf and hard of hearing people include caption decoders, ttys, and flashing lights to indicate sound, for example, the ringing of a phone.

IV. IMPLEMENTATION AND ENFORCEMENT

A. Resolution of Complaints

33. A third approach would be to promulgate rules to assist in resolving

complaints brought under Section 255. Should we adopt as rules any requirements -- such as outreach procedures or accessibility assessments? Should such rules allow for trade associations to undertake these procedures or assessments on behalf of individual service providers? Should these rules exempt small businesses or any other entities?

The FCC should promulgate rules to implement and enforce the provisions of Section 255. Rules allow all interested parties - consumers, equipment manufacturers, service providers, and the FCC - to know what is required and expected. They benefit industry by delineating its legal responsibilities, while at the same time, clarifying what is not required of it. Rules benefit consumers by assuring them that their accessibility needs will be met. Rules must be flexible enough to allow for rapid changes in technology, competition within the industry, and changing consumer demand. At the same time they must be clear so that enforcement does not become burdensome.

The Commission should adopt as rules outreach procedures. The industry cannot adequately meet the accessibility needs of consumers with disabilities unless it consults with them. Individuals with disabilities must be involved in the design, manufacture, use, and upgrade stages.

Accessibility assessments must be required. Without these, consumers will have no assurance that equipment and services are, in fact, accessible. Manufacturers should be required to undertake some type of "disability impact analysis" in order to ensure accessibility.

Voluntary guidelines or a policy statement without rules are not effective. The rights of individuals with disabilities to information should not have to depend on the good will of the telecommunications industry. The history of civil rights for individuals with disabilities shows that in most cases, leaving protection of important rights to the voluntary actions of others has not worked.

Until the Television Decoder Circuitry Act⁷ went into effect in July 1993, deaf and hard of hearing television viewers had to purchase a caption decoder (at a cost of approximately \$150) in order to get the vast amount of news, information, and entertainment that television provides. It took this law, which mandates that a decoder chip be inserted in every new television 13 inches or larger, to make captioned programming automatically accessible to the 28 million deaf and hard of hearing people in this country.⁸

Although the Americans with Disabilities Act mandates accessibility to places of accommodation, the regulatory exemption for movie theaters encourages but does not require owners to show movies that are accessible to deaf and hard of hearing patrons. Representatives from the deaf and hard of hearing community have been involved in intense negotiations to convince theater owners to caption some of their showings, so far with little success.

Until the passage of the ADA, many places of accommodation, including the offices of doctors and lawyers, were not accessible to deaf and hard of hearing patients and clients. While some of these professionals took it upon themselves to ensure that they had clear communication with their patients and clients, many did not. With the passage of the ADA and adoption of its regulations, patients and clients now have an enforceable right to clear communication in these important situations.

We are pleased that The Telecommunications Act mandates accessibility and usability for persons with disabilities. It is one step on the road to full participation in society by people with disabilities. However, without the clear guidance that rules provide, disabled consumers will still

⁷47 U.S.C. §§303 (u), 330 (b).

⁸They are not the only beneficiaries. Captioning provides advantages for the 30 million learners of English as a second language, the 12 million beginning readers, 27 million illiterate adults and the countless others who benefit from captioning in other ways, such as watching a program without disturbing others or trying to follow a program in a noisy environment.

find many telecommunications equipment and services that are not accessible and usable. The Commission must write rules that will reflect the Congressional intent to provide access and usability for this group.

The rules should allow trade associations to undertake outreach procedures or accessibility assessments on behalf of individual service providers. This is one option that should be available to the industry. A trade association, working with consumers, may be in a better position to develop these procedures or assessments, as the association may have members from all segments of the industry, thereby giving it a broader access to information than individual manufacturers may have. Further, a trade association, working with consumers, may be better able to develop an industry standard, thus streamlining the manufacturing of accessible products. The faster these products can come to market, the better it is for the industry and consumers.

That is not to say that this should be the only choice available to the industry, or that particular service providers would be relieved of responsibility because of participation of a trade association. The service provider still must remain liable for accessibility, regardless of who undertakes outreach procedures or accessibility assessments.

There should be no rules exempting small businesses or any other entities. The statute allows for exemptions under the "readily achievable" standard. The statute does not allow for other exemptions.

The complaint-by-complaint approach is not effective. As stated above, all interested parties benefit from clear, enforceable rules. Trying to make an accessibility policy through this piecemeal approach can only result in confusion. The industry needs to ensure accessibility from the design stage on. This enforcement mechanism gives no assurance that the industry will

take into account universal design in the early stages of development. With the complaint-by-complaint approach, industry accountability comes into play at the end of the line - when the consumer is using the product, and when retrofitting, which is expensive and less effective, is the only way to make the product accessible. The preferable approach is one that comes into play early on - devising rules that mandate universal design.

B. Developing Equipment and CPE Guidelines in Conjunction With the Access Board

35. . . . We seek comment on how the Commission should work in conjunction with the Access Board to develop equipment and CPE guidelines . . . What is the most appropriate way to provide guidance regarding overlapping and inter-related services and equipment issues?

Currently the Access Board's Telecommunications Access Advisory Committee (TAAC) is developing guidelines for accessibility and usability for equipment and CPE. TAAC is composed of consumer and industry representatives who are knowledgeable about the issues at hand. They have been working for months to answer some of the design and procedural questions raised in this NOI. The Commission should have the benefit of the expertise and collaboration of this team of experts. The Commission should review the Access Board's recommendations when they are complete and use them to inform its rulemaking decisions. The Access Board's recommendations should be used as minimum standards, with the Commission going beyond those recommendations where necessary to ensure accessibility and usability. The recommendations should be seen as a floor, not a ceiling.

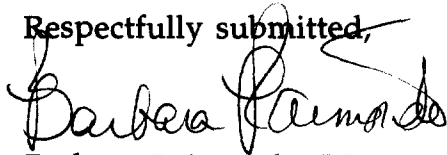
The most appropriate way to provide guidance regarding overlapping and inter-related services and equipment issues is the way described in our response to Question 12. Each company must be held liable. Among the

companies themselves, they may choose to allocate responsibility by contract. The only way to ensure accessibility where overlapping and inter-related services and equipment issues appear is to require all parties involved to be accountable. That will help ensure the cooperation among parties necessary to ensure accessibility.

Conclusion

CAN thanks the Federal Communications Commission for its commitment to access for all Americans and for the opportunity to comment on this important issue. CAN respectfully requests that the Commission ensure that the mandates of Section 255 be implemented in a manner that will ensure maximum accessibility for and usability by persons with disabilities.

Respectfully submitted,



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October 25, 1996

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Regular Members

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